



Wellesley College

Tel: (781) 283-3233
Fax: (781) 283-3686

Simpson Hall
106 Central Street
Wellesley, Massachusetts 02481-8203

Wellesley College
February 10, 2006
Ex Parte Presentation
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

Wellesley College submits this letter to express our concerns that a number-based contribution mechanism could have a substantial detrimental effect on colleges and universities.

We have calculated that our per-month federal universal service obligation would increase from \$ 350 per-month to over \$ 7,260 per-month if a number-based approach were adopted, assuming that the per-number fee was \$1.00.

Wellesley College does not have budgetary flexibility to offset this significant increase. If implemented, the FCC's action would require difficult decisions with respect to institutional services, including, but not limited to,

- the elimination of individual telephone service for students in campus housing.
- the reduction in numbers assigned to professors operating in multiple locations, thereby limiting their access to students.
- possible reconfiguration of the campus network to an extension-based system under which the institution would maintain a single call-in number.
- the shift in policy with respect to maintaining number blocks would significantly impact campus community (and pose potential public safety concerns) with the elimination of the traditional four-digit dialing within the campus.
- the transition of budgeted funding from education and research-based programs to the telecommunications budget.

- possible delays in efforts to upgrade and modernize telecommunications facilities on campus
- The Commission should understand that included as enterprise customers are many not-for-profit organizations, including colleges and universities, local and state governments, charitable organizations, and medical institutions. These entities do not have the resources to internalize significant increases in regulatory fees.

Wellesley College

- asks the FCC to proceed with caution in adopting a number-based plan and carefully review the specific concerns of colleges and universities and the higher education community
- support efforts to modify a number-based proposal through a hybrid approach or through number equivalencies for enterprise customers (i.e., assessments based on PBX trunks not numbers).

Respectfully submitted,

Sandra E. Roberts
Director of Telecommunications
Wellesley College